

ATTACHMENT A



*We fight for big causes and work to advance the greater good
for our clients, and for society as a whole.*

Previn Warren

LICENSED IN: DC

ADMITTED TO PRACTICE BEFORE: U.S. Court of Appeals for Seventh and D.C. Circuits; U.S. District Court for the District of Columbia; U.S. Court of Federal Claims

EDUCATION:

J.D., *magna cum laude*, Harvard Law School, 2011

A.B., *magna cum laude*, Harvard College, 2004

Previn Warren is a trial lawyer who works to protect the rights of individuals against unfair and abusive conduct by technology and media companies.

Over the course of his career, he has litigated numerous cases against conglomerates like Sirius XM, Google and iHeartMedia, forcing these companies to compensate artists at fair rates for use of their music. His work has generated hundreds of millions of dollars in additional royalties for content creators.

In addition, Previn reviews a variety of other problematic practices within the technology industry, including the undisclosed surveillance of consumers and the use of biased algorithms to make hiring and lending decisions. He also represents children whose addiction to allegedly defective social media products has led to anxiety, depression and attempted suicide.

Prior to his time at Motley Rice, Previn worked as a partner at a large corporate firm in Washington, D.C. In that capacity, he led multiple litigation and trial teams in cases that sought to reinforce protections for musicians in the face of rapidly evolving technology. In 2020, Previn's representation of SoundExchange, a digital performance rights nonprofit, resulted in a substantial increase in the royalty revenues that musicians will receive from internet radio services. He also secured a significant victory for copyright owner plaintiffs in a federal lawsuit against a hip-hop website, establishing a landmark precedent concerning infringement in the era of streaming. In other matters, he helped recover \$150 million in underpaid royalties for plaintiffs, and was a key player in a rate-setting trial in 2017 that achieved the largest-ever increase in the royalty rate owed by Sirius XM.

Previn's defense-side work has included numerous representations of major players in the automotive industry. Among other engagements, Previn played a major role in defending Nissan North America in a significant trade secrets lawsuit, defeating a motion to enjoin Nissan's development of two cutting-edge electric vehicles. In 2018, he led a team defeating a putative class action against Nissan concerning disclosures in its vehicle service contracts. Previn's representations in the hospitality sector included defending Marriott International in a significant restrictive covenants case,

helping defeat a motion to enjoin Marriott's \$14 billion merger with Starwood Hotels & Resorts.

While studying at Harvard Law School, Previn served as Articles Co-Chair for the *Harvard Law Review* and earned the Sears Prize for receiving the highest grades in his second year. He was also selected as a Paul & Daisy Soros Fellow in 2009 and a Heyman Fellow in 2011. After completing his legal studies, Previn clerked for former Chief Judge Merrick B. Garland in the D.C. Circuit. He also worked as an enforcement attorney and senior advisor to the director of the Consumer Financial Protection Bureau.

Previn is active in his community. His work in politics includes serving as counsel to the presidential campaign of Pete Buttigieg and serving as a criminal justice policy advisor for New York City Mayor Michael Bloomberg's administration. In 2022, he was appointed to the Board of Directors for the AAPI Victory Alliance, an organization that advocates for policies that empower Asian Americans and Pacific Islanders.

Previn's *pro bono* legal work has included defending the constitutional rights of prisoners in appeals before the D.C. Circuit and Seventh Circuit of the U.S. Court of Appeals, as well as a federal court challenge to the conditions of confinement in South Carolina's juvenile detention centers. Previn's *pro bono* representations have also included work before the U.S. Supreme Court. In *King v. Burwell*, 576 U.S. 988 (2015), Previn authored an amicus brief on behalf of Nobel Prize winning economists, which was cited and quoted three times by Chief Justice Roberts in upholding the Affordable Care Act. Earlier in his career, Previn served as an investigator for the Federal Defenders of New York, assisting prisoners in seeking reductions to their sentences.

AWARDS AND ACCOLADES:

Billboard

2022 Top Music Lawyers

National Law Journal

2019 D.C. Rising Stars

South Asian Bar Association of North America

2019 Rising Star

ASSOCIATIONS:

South Asian Bar Association

In this matter, Previn Warren will be supported by a team of 20 Motley Rice attorneys, including:

Joseph F. Rice motleyrice.com/attorneys/joseph-f-rice

Jodi W. Flowers motleyrice.com/attorneys/jodi-westbrook-flowers

Mathew P. Jasinski motleyrice.com/attorneys/mathew-p-jasinski

Jonathan D. Orent motleyrice.com/attorneys/jonathan-d-orent

Donald A. Migliori motleyrice.com/attorneys/donald-migliori



FIRM OVERVIEW

Motley Rice attorneys aggressively seek justice and accountability for victims across a broad range of litigation, including holding leadership positions in large, complex and impactful litigation targeting the tech industry and cases that aspire to protect the wellbeing of vulnerable children.

Notable cases influenced by our attorneys include:

21st Century Oncology Data Breach MDL

Attorney Jodi Westbrook Flowers serves as liaison counsel for this data breach MDL. The firm helped negotiate a \$12.5 million settlement in 2021 to resolve claims that the cancer care provider 21st Century Oncology neglected to protect the private information of millions of patients in 2015.

Blackbaud Data Breach MDL

Motley Rice filed one of the founding cases against Blackbaud following a 2020 ransomware attack and data breach. Attorney Marlon Kimpson serves as co-lead counsel for plaintiffs who allege millions of names, addresses, phone numbers, bank information and other personal information – including that of children – may have been compromised in the attack.

Cambridge Analytica Data Breach

Motley Rice brought a suit in 2018 for Facebook users who allege the social media network allowed political data firm Cambridge Analytica to violate privacy laws by collecting private information for more than 87 million users.

Sony PlayStation Class Action

Motley Rice filed the nation's first proposed class action against Sony in 2021 for gamers who allege the company is unlawfully monopolizing the sale of PlayStation digital download codes through its exclusive sales at the Sony PlayStation Store.

Twitter Securities Class Action

Motley Rice was appointed lead counsel in 2016 lead counsel for Twitter shareholders who allege the social media giant misrepresented its daily user growth in 2015 to inflate its stock price. The firm negotiated an \$809.5 million settlement in 2021, days before what would have been a rare securities fraud class action jury trial.

Lead Poisoning Litigation

Motley Rice litigates lead poisoning cases for government entities and families of affected children in numerous jurisdictions throughout the country. This includes negotiating a \$305 million settlement in 2019 as lead trial counsel to resolve nearly 20 years of litigation for 10 plaintiff cities and counties that alleged multiple lead paint manufacturers created a public nuisance. Motley Rice attorneys also served as interim class counsel on the PEC for Flint, Mich., residents and helped negotiate a \$600 million settlement in response to the city's water crisis, which exposed thousands of children to toxic lead.

The Opioid Epidemic

Motley Rice is at the forefront of complex, national litigation that aspires to hold opioid manufacturers, distributors and pharmacies accountable for the opioid epidemic. The firm's co-founding member Joe Rice is co-lead counsel for the National Prescription Opiate MDL. His unparalleled experience as a skillful negotiator in some of the nation's largest civil actions over the past 30 years is a benefit to plaintiffs and the Court. Additionally, attorney Linda Singer is co-chair of the MDL's Manufacturer/Marketing Committee and Lou Bograd is co-chair of the Law & Briefing Committee.

Volkswagen 'Clean Diesel' Litigation

Joe Rice and Jodi Westbrook Flowers played key roles in the resolution of Volkswagen's emissions fraud litigation in the Northern District of California. Joe was one of the lead negotiators of the nearly \$15 billion settlement for U.S. owners and lessees of 2.0-liter TDI vehicles. The agreement was the largest auto-related consumer class action settlement in U.S. history and was regarded as one of the fastest resolutions of its type. Motley Rice attorneys also helped recover up to \$4.4 billion for affected owners and lessees of 3.0-liter vehicles.

Big Tobacco Litigation

Motley Rice attorneys took on the tobacco industry in the 1990s, negotiating the largest civil settlement in U.S. history. In addition to reaching the \$246 billion Master Settlement Agreement, this litigation significantly restricted cigarette marketing to children and cigarette smoking rates have declined amongst teens and children in the decades since.

Camel Jockey Human Rights Violations

Motley Rice human rights attorneys filed a federal civil complaint in 2005 against several leaders in the United Arab Emirates for their alleged involvement in kidnapping, human trafficking and child enslavement of young boys for use as camel jockeys. The UAE reportedly banned the use of children as camel jockeys shortly afterward.

Childhood Sexual Abuse

Motley Rice plays a significant role in Boy Scout of America bankruptcy proceedings and negotiations for The Coalition of Abused Scouts for Justice, a group of firms representing thousands former Scouts who survived childhood sexual abuse.